

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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***IN RE* TERRORIST ATTACKS
ON SEPTEMBER 11, 2001**

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: **03 MDL 1570 (GBD)(SN)**
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**This Document Relates to:
Hoglan, et al. v. Iran, et al.
1:11-cv-07550 (GBD)(SN)**

SUBPOENA DUCES TECUM

TO: Fleetscape Capital Holdings Limited

WHEREAS, in an action in the United States District Court for the Southern District of New York, Case Number 11-CV-7550, between Plaintiffs-Judgment Creditors Estate of Alice Hoglan, et al. (“the Hoglan Creditors”), and Defendants-Judgment Debtors Iran, et al. (“the Judgment Debtors”)¹, a final judgment was entered on February 26, 2018 in favor of the Hoglan Creditors and against the Judgment Debtors, awarding the Hoglan Creditors \$3,610,326,671, in addition to prejudgment and postjudgment interest, of which \$3,458,640,585.46 remains uncollected, due, and unpaid;

WHEREAS, it is believed that you are in possession or custody of certain property in which the Judgment Debtors have an interest, including property aboard the tanker vessel SUEZ RAJAN (IMO: 9524475);

¹ The full list of Defendants-Judgment Debtors is as follows: Islamic Republic of Iran, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi Rafsanjani, Iran’s Ministry of Information and Security, Islamic Revolutionary Guard Corps, Iran’s Ministry of Petroleum, Iran’s Ministry of Economic Affairs and Finance, Iran’s Ministry of Commerce, Iran’s Ministry of Defense and Armed Forces Logistics, Central Bank of Iran a.k.a. Bank Markazi, National Iranian Petrochemical Company, National Iranian Oil Company, National Iranian Tanker Company, National Iranian Gas Company, Iran Air, and Hezbollah.

NOW, THEREFORE, WE COMMAND YOU, to produce for examination at the time and place indicated below certain books, papers, and records, to wit:

- (1) Any and all leases, sub-leases or contracts (collectively “Leases”) concerning the use, rental, or occupancy of any property in the State of New York by Fleetscape Capital Holdings Limited covering the period from October 8, 2020 to the present, including, without limitation, any premises located at 277 Park Avenue, New York, NY, but excluding Leases concerning office space at 1301 Avenue of the Americas, New York, NY.

PLACE: Jenner & Block LLP, 1155 Avenue of the Americas, New York, New York 10036.

TIME: July 5, 2022 at 9:30 a.m.

TAKE NOTICE THAT failure to comply with this subpoena is punishable as a contempt of court.

Dated: June 23, 2022

Respectfully submitted,

By: /s/ Lee Wolosky

Lee Wolosky
JENNER & BLOCK LLP
1155 Avenue of the Americas
New York, NY 10036
(212) 891-1628
lwolosky@jenner.com

*Counsel to Judgment Creditors
Estate of Alice Hoglan, et al.*

Schedule A: General Definitions and Rules of Construction

1. "All" means each and every.
2. "Any" means any and all.
3. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the subpoena all information or documents that might otherwise be construed to be outside of its scope.
4. "Communication" means any conversation, discussion, letter, email, memorandum, meeting, note or other transmittal of information or message, whether transmitted in writing, orally, electronically or by any other means, and shall include any document that abstracts, digests, transcribes, records or reflects any of the foregoing.
5. "Concerning" means, directly or indirectly, in whole or in part, relating to, referring to, describing, evidencing or constituting.
6. "Document" is used herein in the broadest sense of the term and means all records and other tangible media of expression of whatever nature however and wherever created, produced or stored (manually, mechanically, electronically or otherwise), including without limitation all versions whether draft or final, all annotated or nonconforming or other copies, electronic mail ("e-mail"), instant messages, text messages, Blackberry or other wireless device messages, voicemail, calendars, date books, appointment books, diaries, books, papers, files, notes, confirmations, accounts statements, correspondence, memoranda, reports, records, journals, registers, analyses, plans, manuals, policies, telegrams, faxes, telexes, wires, telephone logs, telephone messages, message slips, minutes, notes or records or transcriptions of conversations or communications or meetings, tape recordings, videotapes, disks, and other electronic media, microfilm, microfiche, storage devices, press releases, contracts, agreements, notices and summaries. Any non-identical version of a document constitutes a separate document within this definition, including without limitation drafts or copies bearing any notation, edit, comment, marginalia, underscoring, highlighting, marking, or any other alteration of any kind resulting in any difference between two or more otherwise identical documents.
7. "Entity" means without limitation any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or other firm or similar body, or any unit, division, agency, department, or similar subdivision thereof.
8. "Person" means any natural person, or any entity.
9. The use of the singular form of any word used herein shall include the plural and vice versa. The use of any tense of any verb includes all other tenses of the verb.

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SUBPOENA DUCES TECUM

TO: Fleetscape Suez Rajan LLC

WHEREAS, in an action in the United States District Court for the Southern District of New York, Case Number 11-CV-7550, between Plaintiffs-Judgment Creditors Estate of Alice Hoglan, et al. (“the Hoglan Creditors”), and Defendants-Judgment Debtors Iran, et al. (“the Judgment Debtors”)¹, a final judgment was entered on February 26, 2018 in favor of the Hoglan Creditors and against the Judgment Debtors, awarding the Hoglan Creditors \$3,610,326,671, in addition to prejudgment and postjudgment interest, of which \$3,458,640,585.46 remains uncollected, due, and unpaid;

WHEREAS, it is believed that you are in possession or custody of certain property in which the Judgment Debtors have an interest, including property aboard the tanker vessel SUEZ RAJAN (IMO: 9524475);

¹ The full list of Defendants-Judgment Debtors is as follows: Islamic Republic of Iran, Ayatollah Ali Hoseini Khamenei, Ali Akbar Hashemi Rafsanjani, Iran’s Ministry of Information and Security, Islamic Revolutionary Guard Corps, Iran’s Ministry of Petroleum, Iran’s Ministry of Economic Affairs and Finance, Iran’s Ministry of Commerce, Iran’s Ministry of Defense and Armed Forces Logistics, Central Bank of Iran a.k.a. Bank Markazi, National Iranian Petrochemical Company, National Iranian Oil Company, National Iranian Tanker Company, National Iranian Gas Company, Iran Air, and Hezbollah.

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- (1) Any and all leases, sub-leases or contracts (collectively “Leases”) concerning the use, rental, or occupancy of any property in the State of New York by Fleetscape Suez Rajan, LLC covering the period from October 8, 2020 to the present, including, without limitation, any premises located at 277 Park Avenue, New York, NY, but excluding Leases concerning office space at 1301 Avenue of the Americas, New York, NY.

PLACE: Jenner & Block LLP, 1155 Avenue of the Americas, New York, New York 10036.

TIME: July 5, 2022 at 9:30 a.m.

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Dated: June 23, 2022

Respectfully submitted,

By: /s/ Lee Wolosky

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lwolosky@jenner.com

*Counsel to Judgment Creditors
Estate of Alice Hoglan, et al.*

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6. "Document" is used herein in the broadest sense of the term and means all records and other tangible media of expression of whatever nature however and wherever created, produced or stored (manually, mechanically, electronically or otherwise), including without limitation all versions whether draft or final, all annotated or nonconforming or other copies, electronic mail ("e-mail"), instant messages, text messages, Blackberry or other wireless device messages, voicemail, calendars, date books, appointment books, diaries, books, papers, files, notes, confirmations, accounts statements, correspondence, memoranda, reports, records, journals, registers, analyses, plans, manuals, policies, telegrams, faxes, telexes, wires, telephone logs, telephone messages, message slips, minutes, notes or records or transcriptions of conversations or communications or meetings, tape recordings, videotapes, disks, and other electronic media, microfilm, microfiche, storage devices, press releases, contracts, agreements, notices and summaries. Any non-identical version of a document constitutes a separate document within this definition, including without limitation drafts or copies bearing any notation, edit, comment, marginalia, underscoring, highlighting, marking, or any other alteration of any kind resulting in any difference between two or more otherwise identical documents.
7. "Entity" means without limitation any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or other firm or similar body, or any unit, division, agency, department, or similar subdivision thereof.
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Hoglan, et al. v. Iran, et al.
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SUBPOENA DUCES TECUM

TO: Oaktree Capital Management LP

WHEREAS, in an action in the United States District Court for the Southern District of New York, Case Number 11-CV-7550, between Plaintiffs-Judgment Creditors Estate of Alice Hoglan, et al. (“the Hoglan Creditors”), and Defendants-Judgment Debtors Iran, et al. (“the Judgment Debtors”)¹, a final judgment was entered on February 26, 2018 in favor of the Hoglan Creditors and against the Judgment Debtors, awarding the Hoglan Creditors \$3,610,326,671, in addition to prejudgment and postjudgment interest, of which \$3,458,640,585.46 remains uncollected, due, and unpaid;

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NOW, THEREFORE, WE COMMAND YOU, to produce for examination at the time and place indicated below certain books, papers, and records, to wit:

- (1) Any and all leases, sub-leases or contracts (collectively “Leases”) concerning the use, rental, or occupancy of any property in the State of New York by Oaktree Capital Management LP covering the period from October 8, 2020 to the present, including, without limitation, any premises located at 277 Park Avenue, New York, NY, but excluding Leases concerning office space at 1301 Avenue of the Americas, New York, NY.

PLACE: Jenner & Block LLP, 1155 Avenue of the Americas, New York, New York 10036.

TIME: July 5, 2022 at 9:30 a.m.

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Dated: June 23, 2022

Respectfully submitted,

By: /s/ Lee Wolosky

Lee Wolosky
JENNER & BLOCK LLP
1155 Avenue of the Americas
New York, NY 10036
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*Counsel to Judgment Creditors
Estate of Alice Hoglan, et al.*

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